

DAVID R. SIDRAN (SBN 121063)
 THOMAS M. CROWELL (SBN 172799)
 TOSCHI, SIDRAN, COLLINS & DOYLE
 5145 Johnson Drive
 Pleasanton, CA 94588
 Tel: (510) 835-3400
 Fax: (510) 835-7800
dsidran@toschisidran.com
tcrowell@toschisidran.com

Attorneys for Defendants,
 CONCORD AUTOMOBILE DEALERSHIP LLC DBA
 LEXUS OF CONCORD LLC, HANK TORIAN AND GREG
 JAMES

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ROBERT E. BROCK JR.; AMANDA BO
 DENTON; JEFFERY LAO; KAMAL
 DAYEKH; WILSON WOO; CHRISTOPHER
 MONTOYA; FRANCISCO UBALDO; and
 other Similarly Situated Employees; TERESA
 M. BROCK; WISSAM HALHOUL; and
 DOES 1-200,

Plaintiffs,

v.

CONCORD AUTOMOBILE DEALERSHIP
 LLC DBA: LEXUS OF CONCORD LLC;
 TOYOTA MOTOR SALES U.S.A., INC.;
 HANK TORIAN; PATRICK MILIANO;
 GREG JAMES; and ROES 1-200,

Defendants.

Case No.: 14-cv-01889-HSG

**STIPULATION TO EXTEND TIME TO
 RESPOND TO SECOND AMENDED
 COMPLAINT; AND ORDER THEREON**

(Northern District Local Rules 6.1(a))

A. INTRODUCTION

This action involves eleven Plaintiffs, nine of which are former employees of Defendant Lexus of Concord, alleging various claims under Title VII, including discrimination, hostile work environment, retaliation, and various wage claims. The Defendants filed motions to dismiss pursuant to FRCP 12(b)(6). On stipulated order, the motions to dismiss were withdrawn in order to allow Plaintiffs to amend their complaint, to allow the Equal Employment Opportunity Commission to complete their review of the administrative claims, and possibly to add more

1 plaintiffs to the complaint. A First Amended Complaint was filed, and Defendants filed motions
2 to dismiss under FRC 12b6. On January 29, 2015, the Court granted the Motions to Dismiss with
3 leave to amend. (See Document 55 in the court docket.) The order required Plaintiffs to file an
4 amended complaint within 14 days from the date of the order. There were very specific pleading
5 requirements included in the order. Defendants are to file their response within 14 days from the
6 date the Second Amended Complaint is filed.

7 The Second Amended Complaint is 71 pages long, with 68 pages of pleading. This is
8 significantly shorter than the First Amended Complaint, yet still a complex and complicated
9 document. Further, some, but not all of the issues raised in the motion to dismiss the First
10 Amended Complaint appear to have been addressed in the pleading (note that the Court did not
11 address the legal issues raised in these motions.) Combined with the fact that counsel for
12 Defendants has been in trial preparation for a complicated trial, an additional week has been
13 requested to file a response to the Second Amended Complaint.

14 Defendants' current deadline to file their response to the Second Amended Complaint is
15 February 27, 2014. Defendants request that the deadline be extended to March 6, 2015.

16 **B. STIPULATION**

17 Parties hereby stipulate as follows:

- 18 1. Defendants' deadline to response to the Second Amended Complaint shall be extended to
19 March 6, 2015.
- 20 2. No party is prejudiced by this extension.

21 **C. CONCLUSION**

22 For these reasons, the parties ask this court to grant an order extending Defendants'
23 deadline to respond to the Second Amended Complaint to March 6, 2015.

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1 Dated: February 26, 2015

TOSCHI, SIDRAN, COLLINS & DOYLE

2
3 /s/ David R. Sidran

4 David R. Sidran
5 Thomas M. Crowell
6 Attorneys for Defendants,
7 Concord Automobile Dealership, LLC dba
8 Lexus of Concord LLC, Hank Torian, and
9 Greg James

10 Date: February 26, 2015

PORTER SCOTT

11 /s/ Derek J. Haynes

12 Michael W. Pott
13 Derek J. Haynes
14 Attorneys for Defendant
15 PATRICK MILIANO

16 Dated: February 26, 2015

LAW OFFICES OF BONNER & BONNER


17 /s/Charles A. Bonner

18 Charles A. Bonner
19 Attorney for Plaintiffs

20 **ORDER**

21 After considering the parties' Stipulation and GOOD CAUSE SHOWN, it is ordered that
22 Defendant's deadline to respond to the Second Amended Complaint shall be extended one week to
23 March 6, 2015.

24 Dated: February 27, 2015



Hon. Haywood S. Gilliam, Jr.

25 U.S. District Judge
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